

**DEQ NORTHWEST REGION
COMPLAINT INVESTIGATION REPORT
Hydro Extrusion – Coating Division
5325 NE Skyport Way
Portland, OR 97218-1243
EPA ID# ORD982656076**



Inspection Date): May 21, 2020
DEQ Inspector: Zeb Bates
DEQ Contractor: NRC Environmental Services
Facility Representatives onsite:
Samuel Margheim – Environmental Engineer
Steve Nelson – Operations Manager
Rob Killgore – Plant Manager
Facility Representatives via phone:
Michele Jenkins – Corporate EHS
E.Jay Murphy – Farallon Consulting, Associate Compliance Specialist

Prepared by

A handwritten signature in black ink, appearing to be 'Zeb Bates', is written over a light blue horizontal line.

On July 14, 2020

GENERAL INFORMATION

Purpose of Inspection

The Department of Environmental Quality (DEQ) conducted an unannounced complaint investigation of Hydro Extrusions – Coating Division (Hydro) to determine its compliance with the Federal Resource Conservation and Recovery Act (RCRA), the Oregon Revised Statutes (ORS) and the Oregon Administrative Rules (OAR) standards for managing hazardous waste, industrial process wastewater, and industrial stormwater. DEQ is authorized by the US Environmental Protection Agency (EPA) to regulate hazardous waste management in Oregon. The purpose of these laws and rules is to prevent releases of hazardous waste onto the land, into the air, or to surface or groundwater, and to ensure proper handling and cleanup if releases occur. DEQ is also authorized by the Federal Clean Water Act to regulate point source discharges of industrial wastewater and stormwater to waters of the state.

Facility Background Information and Permits

Hydro coats aluminum architectural pieces used in the siding of commercial buildings. The facility runs two production lines: one for larger pieces on the horizontal line and the other line is for small parts that are run on the vertical line. This facility generates and reports between 440,000 – 602,000 of hazardous waste annually.

Hydro has a standard ACDP Air Quality permit from DEQ; number 26-3241-ST-1, which was issued on 11/21/2018 and expires on 11/01/2023. Hydro has had permit coverage under the NPDES 1200-Z Industrial Stormwater Discharge General Permit since December 28, 1999 (file. 104692, reissued October 22, 2018) which allows discharge to the Columbia Slough. This facility is required to comply with all permit conditions, including preventing unauthorized discharges, reporting, and operating in accordance with DEQ-approved plans. Hydro also has an industrial wastewater pre-treatment permit from the City of Portland Bureau of Environmental Services (BES) (permit number 433.035, expires 12/17/2024) which allows the facility to discharge process wastewater to the sanitary sewer.

Pre-inspection meeting

I arrived at the facility at approximately 0900 hours, I met Mr. Samuel Margheim upon entering the main office area by the reception area. Mr. Margheim said that he is the facility Environmental Engineer and asked the reason for the visit. I introduced myself to Samuel, provided credentials, and explained the reason for the site visit; DEQ complaint investigation and inspection of the stormwater system and DEQ's contractor will be collecting samples of the stormwater system, two Grattix boxes and other points of interest if identified to substantiate the complaint. While explaining the reason for the site visit I handed an Oregon Department of Environmental Quality "Consent to Inspection and Sampling" form. Mr. Margheim completed and signed the form. I asked Mr. Margheim if he would like to make a copy of the form for their records. Mr. Margheim made and retained a copy for Hydro's records. I asked Mr. Margheim if there were any other Hydro personnel he needs to contact to join the inspection. Mr. Margheim said that he will need to contact a few folks to join us. I explained to Mr. Margheim that we can wait by the stormwater treatment system and explained that the other folks can join us there.

Mr. Margheim and I donned our additional personal protective equipment (high visibility vest, safety glasses, and gloves) and made our way to the "AQUIP," Hydro's stormwater treatment unit. Mr. Nelson arrived at the AQUIP shortly thereafter. I introduced myself to Mr. Nelson and we exchanged business cards. At this time, I explained to Mr. Margheim and Mr. Nelson that DEQ received an anonymous complaint alleging that Hydro was discharging hazardous waste into their stormwater system. Furthermore, DEQ received information about an odor that made someone physically ill for 3-days after walking on the Northside of their facility between the exterior doors and their wastewater treatment unit. Lastly, I explained that DEQ contractor is en route and will be arriving shortly to collect stormwater and sediment samples. I further explained that the DEQ contractor is going to be performing personal air monitoring via PID and 4-gas meter for VOCs and Hydrogen Sulfide.

Safety meeting and scope of sampling discussion and sampling event

NRC Environmental Services (NRC), DEQ environmental contractor, arrived on-site at approximately 0954 hours. Andy Truong, NRC Project Manager would be performing the sampling with two other NRC technicians. Before starting the sampling event, NRC personnel conducted a general tailgate safety meeting. After NRC tailgate safety meeting, Mr. Nelson gave a tailgate safety meeting for Hydro.

After the safety meeting, I went over the scope of work with NRC and Hydro. I explained that there would be five sampling locations. The first three will be of the stormwater sedimentation chamber and the stormwater filtration unit pre and post-filtration. The other two will be of Grattix box number 6 on the east side of the facility and Grattix box number 9 on the north side of the facility.

Mr. Rob Killgore joined the investigation and sampling event. Mr. Margheim stated that Hydro will collect split samples with NRC. NRC assisted Hydro in collecting split samples of all sample sets performed during the inspection.

The first sampling set was in the below-grade stormwater sedimentation chamber (SSD). The initial scope of work was to collect samples of sediment from the SSD. However, after multiple attempts and the inability to collect any quantity of sediment the plan was revised to collect liquid stormwater samples. NRC proceeded to collect the sample set, completed the chain of custody (COC), and properly stored the samples.

The second sampling set was performed in the AQUIP stormwater filtration unit's main chamber. NRC collected liquid stormwater samples, completed the COC, and properly stored the samples.

The third sampling set was performed in the AQUIP ancillary piping discharge sampling point. NRC collected liquid stormwater samples, completed the COC, and properly stored the samples.

The fourth sampling set was performed in Grattix box number 6. NRC collected a composite sample set of the first six inches of media directly under the downspout of the gutter system. NRC completed the COC and properly stored the samples.

The fifth sampling set was performed in Grattix box number 9. NRC collected a composite sample set of the first six inches of media directly under the downspout of the gutter system. NRC completed the COC and properly stored the samples.

While NRC was collecting media samples from Grattix box 6 and 9, I requested that Mr. Nelson accompany me to look at the north side of the facility. While we were walking the grounds I asked Mr. Nelson if he was aware of any black hoses that were being utilized to discharge hazardous waste into their stormwater system. Mr. Nelson explained that Hydro doesn't discharge hazardous waste into their stormwater system and doesn't recall seeing a black hose.

Once Mr. Nelson and I made our way to the east side of the building next to where there is an exterior roofed small structure attached to the main building with metal fencing that houses their industrial air-compressor. I observed a black hose coming from the exterior structure and directly placed into a subgrade broken pipe located outside of the small structure next to the main facility. While inspecting the area, I observed that the condensate line from the air-compressor is plumbed into a blue polyethylene container (BPC). The BPC had words on the top written in black sharpie "oil/water separator." This BPC black discharge hose was directly placed into the broken subgrade pipe. I also observed an affixed vertical hard plumbed line on the exterior of the main building running directly next to the downspout with a hose connected to it running into a second BPC. This BPC also had words on the top written in black sharpie "oil/water separator." There was a black discharge hose connected to this BPC laying directly on the ground. I asked Mr. Nelson and Mr. Margheim if they knew what the hardline was for and if the subgrade broken piping is part of the wastewater, stormwater, or any other system. Mr. Nelson and Mr. Margheim stated they didn't know what system the broken piping was a part of. Mr. Nelson went inside the facility to identify what system the vertical hardline was connected to and a part of. When Mr. Nelson returned outside, he explained that the vertical hardline piping is part of the facility's air-dryer system.

I had NRC collect a single swipe sample of the two black hoses attached to the BPC's and from the inside of the broken subgrade pipe. NRC completed the COC and properly stored the sample.

NRC departed the site at approximately 1240 hours.

Exit meeting

A brief exit meeting was held in the lunchroom of the main facility with an adequate distance between in-person participants. In the meeting room were myself, Mr. Margheim, Mr. Nelson, and Mr. Killgore. On the phone was Ms. Michele Jenkins and Ms. E.Jay Murphy.

I thanked Hydro personnel for spending time with DEQ and NRC to go through this sampling event and granting access to all locations requested. I explained to the folks on the phone the reason DEQ was onsite collecting samples. Ms. Murphy requested information about the complaint and an overall explanation of what was sampled at the site. I explained to Ms. Murphy that a public records request will have to be requested for the complaint and any other document associated with this complaint. I further explained that the complainant was alleging that hazardous waste was being discharged into Hydro's stormwater system and or directly into the Columbia Slough. I further explained that Hydro site personnel did collect split samples with NRC. Ms. Murphy also requested the analytical parameters that DEQ will be sampling for. I explained the table below:

	1	2	3	4	5	Hoses/Pipe
PPM-13 Metals (minus mercury)	x	x	x	x	x	x
VOCs – full suite	x	x	x	x	x	no
SVOCs – full suite	x	x	x	x	x	no
Total cyanide	x	x	x	x	x	no
Total Sulfur	x	x	x	x	x	no
Sulfide	x	x	x	x	x	no

I requested that Hydro perform the following and submit documentation and or photos to DEQ by Friday, May 29, 2020:

- Submit diagram for stormwater system
- Submit diagram for wastewater system
- Perform a dye test on the observed broken subgrade pipe
- Remove the black hose from BPC directed into the broken subgrade pipe
- Fix subgrade broken pipe and install new pavement over the top

Hydro personnel agreed to DEQ request and I departed the site at 1300 hours.